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Attorneys for Debtor
FILOMENIA MARIA DE ANDRADE-PHENE

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT COURT OF CALIFORNIA

In re: FILOMENIA MARIA DE ANDRADE-PHENE, Debtor.	) Case No.: 11-43470-A-7)) Chapter 7)) DCN: RAC - 01))))) **MOTION FOR ORDER COMPELLING**) **TRUSTEE TO ABANDON DEBTOR'S**) **BUSINESS AS ASSET OF ESTATE [11**) **USCS §§ 554(b), 721]**))))) Date: December 19, 2011) Time: 10:00 a.m.) Courtroom: 28, 7th Floor) Honorable Judge Michael S. McManus))

**MOTION FOR ORDER COMPELLING TRUSTEE TO ABANDON DEBTOR'S
BUSINESS AS AN ASSET OF THE ESTATE**

Debtor, FILOMENIA MARIA DE ANDRADE- PHENE by and through her attorney of

record Richard A. Chan Jr., will and hereby does bring a Motion to Compel Trustee to Abandon

The Estate's Interest in Debtor's Business ("Motion") pursuant to 11 U.S.C.S. §§554(b) and 721 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6007(b).

By this motion Debtor requests that the Court enter an order compelling the Chapter 7 Trustee to abandon the bankruptcy estate's interest in Debtor's business on the following grounds:

1. Debtor's business does not possess or own any assets that might be liquidated for value to benefit creditors and is therefore of inconsequential benefit to the estate, and;

2. The retention and operation of the business by the Trustee would be burdensome and costly to the estate and the creditors thereof.

Said grounds will be supported by this notice of motion, by the motion filed herewith, by the pleadings and papers on file in this bankruptcy case, memorandum of points and authorities herein, declaration in support of this motion and exhibits, if any, filed herewith, and by such oral and documentary evidence as the Court may permit upon the hearing of this motion.

Respectfully submitted,
ALLAYE CHAN LAW GROUP

Dated: November 9, 2011

By: /s/ Richard A. Chan Jr.
Richard A. Chan Jr.
Attorney for Debtor